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March 6, 2018

Hon. Stewart D. Aaron
U.S. District Court
500 Pearl Street
New York, NY 10007

Re: Ortiz v. Todres & Co., 15 CV 1506 (LGS)

Dear Judge Aaron:

The parties in the above matter write to update the Court on the progress of discovery in the above matter, and, in accordance with the Court's February 13, 2018 order (ecf no. 66), to respectfully request an extension of the discovery period from March 9 to March 12, 2018. This is for the limited purpose of rescheduling the deposition of Michael Todres, the defendant's principal, from the currently scheduled date of March 8, to Monday, March 12, because of the impending winter storm.

Since the date of the last conference with the Court, defendant has taken the deposition of the plaintiff, Herman Ortiz on February 22, and plaintiff has taken the deposition of Todres & Co. personnel Steven Cooperberg and Tom Kelly on March 5; and plaintiff is scheduled to take the deposition of third party witness New York College of Health Professions on March 8 (subject to Magistrate Judge Freeman's granting defendant's counsel's pending request to adjourn a conference with Judge Freeman previously scheduled for March 8).

Thank you for your attention to this matter.

Sincerely yours,

McINNIS LAW
By: _____
Richard F. Bernstein
Attorneys for plaintiff

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Attorneys for defendant